

TARRANT REGIONAL WATER DISTRICT

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Fort Worth, Texas 76102-1097

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BY

July 17, 2006

Office of Chief Clerk
MC 105
TCEQ
P.O. Box 13087
Austin, TX 78711-3087

CHIEF CLERK'S OFFICE

2006 JUL 20 AM 9:51

TEXAS
COMMISSION
ON ENVIRONMENTAL
QUALITY

RE: Proposed Permit No. WQ0010847001

Dear Chief Clerk:

The Tarrant Regional Water District (the District) submits this letter in response to the City of Aledo's application for a permit to discharge 600,000 gallons per day of treated wastewater into an unnamed tributary, thence the Clear Fork of the Trinity River (Segment 0831) above Lake Benbrook (Segment 0830).

The District is the major water rights holder in Lake Benbrook and uses this water to supply drinking water plants in the cities of Fort Worth, Benbrook, Arlington and Mansfield. Numerous complaints have been received about Benbrook Lake's taste and odor problems. Rigorous testing of 6 north central Texas water supply reservoirs the last few years has shown Benbrook to often be the highest in Geosmin, an organic compound that is derived from dying algae cells and the source of the water's earthy/musty odor. Significant water treatment costs are associated with reducing this taste and odor in finished water.

The TCEQ's 2002 305b report draws attention to Lake Benbrook's Nutrient Enrichment and Algae Growth concerns. In September 2005, the TCEQ's nutrient criteria committee presented a Lake Benbrook Chl'a' criteria of 29.37 ug/L. This historical based criteria is one of the highest in the state

Since Lake Benbrook has been identified by the State as having significant phytoplankton growth and use related problems, the District wants to go on record and request that all new and amended wastewater treatment discharges do not increase the net load of total phosphorus to the reservoir.

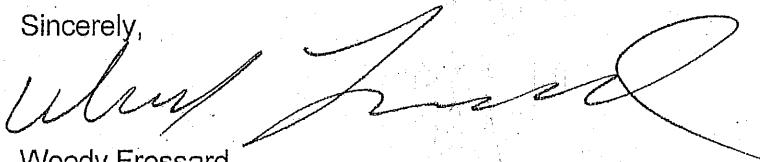
Aledo is currently permitted for 350,000 gallons per day. Weekly effluent testing by the City of Willow Park from Nov 2001 through Oct 2002 had a mean Total Phosphorus concentration of 2.25 mg/L. This permitted flow and this concentrations equate to a loading of 6.57 pounds of total phosphorus per day to the Clear Fork of the Trinity and hence, Benbrook Lake. The District suggests in the interest of no further degradation of Lake

Benbrook's water quality to set 6.57 pounds per day as a maximum total phosphorus limit for this new discharge.

In addition, the City of Aledo has recently signed an interlocal agreement with the TRWD and other entities to pursue a Research and Planning Fund Grant from the Texas Water Development Board for the development of a Regional Facility Plan that includes waste water management for the area. With this study just beginning, the District would request the TCEQ to postpone any action regarding the expansion of this plant until a regional waste water plan is developed.

Should you have any questions, please let me know.

Sincerely,



Woody Frossard
Director, Environmental Services Division